



Belindage@aol.com on 02/01/2002 12:38:13 PM

To: vss@FEC
cc:

Subject: Public Comment on Voting Systems

Attached in a Microsoft word document are my comments. Thank you, Belinda
Carlton, Advocate/Consumer



- vss.doc

February 2, 2002

February 1, 2002

Ms. Penelope Bonsall
Director
Office of Election Administration
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463
Public Comment on Notice 2001:

Voluntary Standards for Computerized Voting Systems

Dear Ms. Bonsall:

Thank you for the opportunity to comment on the proposed standards for computerized voting systems. My name is Belinda Carlton. I retired as Executive Director of the Coalition of Texans with Disabilities a year ago and was not aware of these proposed standards until last week. For ten years I worked to advance voting rights in Texas. As you know, we lead the nation, having passed the first piece of legislation requiring that individuals with disabilities be provided equal opportunity to cast a secret ballot. HB1053 was passed in 1999 by the 76th Texas Legislature. I participated in writing the rules and standards as an appointee to the Texas Secretary of State Task Force on Accessible Voting.

In these comments I will elaborate on two broad problems I find with the proposed standards for computerized voting systems:

The proposed FEC rules for accessibility limit access to select groups of citizens with disabilities. We can and we must be fully inclusive of all citizens, including all citizens with disabilities – physical, sensory and mental - in legislation and standards for voting systems.

You acknowledge in the Notice and in the Overview, Issues Not Addressed by the Revised Standards, Detailed Human Interface and Usability Standards that *"human interface considerations are an integral part of developing an accurate, reliable voting system."* I would ask that you add at the end of this quote: **"that provides all citizens the opportunity to cast a secret ballot."** Certain individuals must be assisted by another individual, most preferably an election official in order to cast an accurate ballot. I plead with the FEC to include this issue in your investigation of human factor issues for development of future specifications. Showing the individual who is blind how to operate a voting machine is no different than assisting the individual with a cognitive limitation. Especially individuals with mental impairments, and all citizens with disabilities to a degree, are not provided non-discriminatory and appropriate accommodation at the ballot box.

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Additionally I urge that Introduction, 1.4 Accessibility for Individuals with Disabilities be amended with the addition of a sentence at the end of paragraph 1 that reads:

"Adopting the technical standards for accessibility will not entirely eliminate the need to accommodate the needs of certain voters with disabilities by human interface."

In Texas our rules were cutting edge when written, but the standards for access written by the U.S. Access Board are a great improvement. Still, 2.2.7.1 Common Standards and 2.2.7.2 DRE Standards hinder advancement of technology that will provide the greatest access. At CTD we had three demonstrations of voting systems with a broad range of disabilities represented. Applying the Common Standards found in the FEC proposed rules, 2.2.7.1 would have rendered many systems unusable by individuals with limited reach and/or limited mobility. Additionally, 2.2.7.1 Common Standards will do nothing to provide the opportunity to cast a secret ballot for countless citizens with disabilities and older Americans who have mental disabilities. I also urge that language acknowledging the limitation of these rules be included in 2.2.7 Accessibility with the insertion of **"a broad range"** between *"needs of"* and *"voters with disabilities."*

As suggested for the Introduction, 1.4 above, I urge that language acknowledging the need for human interface, as an integral part of meeting the accessibility needs of individuals with disabilities be included in 2.2.7 Accessibility.

Finally, the adoption of the most accessible system currently available could be aided by the addition of an additional paragraph in 2.2.7 Accessibility:

The adopting authority shall establish a selection committee to provide input regarding the acquisition by purchase, lease or other means of a voting system that includes individuals with disabilities; work cooperatively with disability-related organizations; and provide individuals with disabilities the opportunity to test a voting system before the adopting authority makes a decision regarding acquisition.

The FEC proposed rules only acknowledge two systems, Paper-based Systems and Direct Recording Electronic (DRE) systems. The DRE may be the best gadget on the market today, but a DRE is not a universally accessible system. I certainly would not suggest at this point in rule-making that you should change the your presentation of rules for only two systems. However, I would like to see language in the appropriate place acknowledge the limitations of technology in accommodating certain individuals with disabilities and present a vision for universal accessibility.

Thank you for your service to America.

Sincerely,

Belinda Carlton

February 2, 2002

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